

EXHIBIT H

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF MIRIAM RODRIGUEZ

I, Miriam Rodriguez, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based upon my personal knowledge unless otherwise indicated.

2. On September 11, 2001, I was in New York City when the terrorist attacks of the World Trade Center (WTC) Towers occurred.

3. At the time of these attacks, I was a citizen of the Dominican Republic. I later became a United States citizen in 2004. Attached as Exhibit A to this Declaration is a true and correct copy of my current proof of U.S. citizenship.

4. I had been employed with the New York Marriott World Trade Center Hotel as a housekeeper for approximately thirteen years prior to the events of September 11th. Attached as Exhibit B to this Declaration is a true and correct copy of my proof of employment with Marriott International, Inc., at the time of these terrorist attacks.

5. I arrived at the Marriott World Trade Center Hotel for my regular shift on the morning of September 11th at 7:30 a.m.

6. When the first passenger jet, American Airlines Flight 11, crashed into the upper section of the North Tower, I had been working on the 4th Floor of the hotel. I heard an explosion and I felt the building shake. As I had previously been trained by Marriott following the World Trade Center bombing in 1993, I immediately ran to the lobby area of the hotel to receive additional information and instructions.

7. In the lobby, I saw police officers and firefighters everywhere, and they instructed me to evacuate the building. As I exited from the Marriott Hotel, I saw that the North Tower of the World Trade Center was on fire. I saw horrible scenes of people jumping out of the windows of the upper section of the North Tower. The scene looked like a war zone.

8. As I stood and watched the chaos around me, a second passenger jet plunged into the upper section of the South Tower. I became paralyzed with fear and I felt as though I could not move. A coworker then grabbed me and encouraged me to run from the area with him. As I ran from the area with my coworker, I saw carnage and people hanging out of the windows of the North and South Towers. The scene was horrific.

9. I ran with a crowd of people towards the Financial Center to escape from the area. I came to a wall that a crowd of people were jumping over to get away from the falling bodies and building debris. I jumped over the wall but I landed awkwardly on my left leg. I immediately collapsed to the ground in extreme pain. My left ankle and my left leg began to immediately swell, and I could barely place any weight on my left leg due to the extreme pain.

10. Determined to escape from the death and destruction around me, I struggled to my feet and I limped away from the area. I somehow found a taxicab which then took me to my

mother's home in Manhattan. By the time I reached my mother's house I was unable to walk due to the swelling in my left ankle and leg.

11. Due to my extreme pain and the swelling in my left ankle and leg, my brother and daughter took me to the Emergency Room at Jacobi Medical Center, in the Bronx, New York, in the late afternoon of September 11th. I received initial care and treatment of my 9/11-related physical injuries at Jacobi, and I received additional treatment for my injuries from several other medical providers in the weeks, months, and years after the events of 9/11 had ended.

12. Attached as Exhibit C to this Declaration is a true and correct copy of my select relevant medical records¹ related to the treatment that I received following the September 11, 2001 terrorist attacks.

13. As a result of these terrorist attacks, I suffered the following specific physical injuries on September 11, 2001: a left ankle and leg injury² with torn ankle ligaments³, as well as consequential left lumbosacral derangement in my spine and lower back⁴.

14. Due to my experience on 9/11 and my memories of that fateful day, I also have received continuous treatment for depression and post-traumatic stress disorder⁵ (PTSD).

15. I previously pursued a claim (Claim Number VCF 212-002786) through the September 11th Victim Compensation Fund specifically related to my physical injuries incurred as a result of the September 11, 2001 terrorist attacks, and my claim was determined to be eligible.

¹ See, 9/11 Injury Records of Miriam Rodriguez (RODRIGUEZ_MEDS_0001), attached hereto as Exhibit C, at 0001-0039.

² *Id.* at 0001-0004, 0006, 0016, 0018-0023, 0025-0027, 0029-0031, 0035, and 0037-0039.

³ *Id.* at 0005-0007, 0016-0018, 0021-0022, and 0037-0038.

⁴ *Id.* at 0020, 0023-0027, 0029, 0030-0031, and 0035-0039.

⁵ *Id.* at 0008-0015, and 0037-0038.

I DECLARE, VERIFY AND STATE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 2 day of June 2024.

Declarant Miriam Rodriguez

**EXHIBITS
FILED
UNDER SEAL
(ECF No.
5716)**